

IN THE MATTER of an appeal under clause 14(1) of
the First Schedule of the Resource
Management Act 1991

AND IN THE MATTER OF the Proposed Southland Water
and Land Plan

BETWEEN **FONTERRA CO-OPERATIVE
GROUP LIMITED**

Appellant

AND **SOUTHLAND REGIONAL
COUNCIL**

Respondent

**NOTICE PURSUANT TO SECTION 274
OF THE RESOURCE MANAGEMENT ACT 1991**

To: The Registrar
Environment Court
Christchurch

TAKE NOTICE that Federated Farmers of New Zealand Inc (Southland) gives notice pursuant to s274 of the Resource Management Act 1991 that it wishes to appear as a party to the above proceedings.

This Notice is made upon the following grounds:

- 1 Federated Farmers of New Zealand Inc (Southland) lodged a submission and Further submission to the Proposed Southland Water and Land Plan to which this appeal relates and/or has an interest in these proceedings that is greater than the public generally.
- 2 Federated Farmers of New Zealand Inc (Southland) is not a trade competitor for the purposes of section 308D of the Resource Management Act 1991.
- 3 Federated Farmers of New Zealand Inc (Southland) is interested in parts of the proceeding, in particular in relation to:

Policy 16

- Federated Farmers opposed in part the policy as notified;
- We agree with the appellant that implementation issues will result from the decisions-version of the Policy, given the lack of clarity on terms included;
- The Policy is set to apply in the interim period prior to the setting of freshwater management objectives applicable to each Freshwater Management Unit, yet there is a lack of certainty what 'test' will apply to determinations around 'over-allocated' or 'degraded'.
- We support the relief sought by the appellant in this regard.

Policy 17

- Federated Farmers opposed in part the Policy as notified;
- We support the consequential relief sought by the appellant, to more accurately reference the 'applicable' best practice guidelines referenced in the appeal document for Rule 32.

Rule 20(d)

- Federated Farmers supported in part the Rule as notified;
- We agree with the appellant that there will be practical difficulties in implementing Rule 20(d).
- There is no current means of assessing the annual amount of nitrogen, phosphorus, sediment and microbiological contaminants in the way indicated;
- This raises uncertainty for plan users.
- We support the relief sought by the appellant in this regard.

Rule 32B

- Federated Farmers opposed in part the Rule as notified;
- We agree with the appellant that there are considerable practical difficulties associated with farmers adopting the required processes;
- The requirements are unnecessary and impractical.
- We support the relief sought by the appellant in this regard.

Rule 32D

- Federated Farmers opposed in part the Rule as notified.
- We agree with the appellant that the decisions version of the rule places unreasonable and inappropriate obligations on small-scale components of the agricultural effluent storage system.
- We support the relief sought by the appellant in this regard.

Rule 54

- Federated Farmers supported in part the Rule as notified;
- We agree with the appellant that it is unnecessary and unreasonable to require daily recording of water-take data for groundwater takes over 20,000 litres per day.
- We are unaware of any other regional plan that requires this level of data recording;
- We agree with the relief sought by the appellant and consider weekly recording is more appropriate.

4. Federated Farmers of New Zealand Inc (Southland) agrees to attend mediation and/or dispute resolution in regard to these proceedings.

Dated the 22nd day of June 2018



Darryl Sycamore
Senior Policy Advisor

Address for Service:
Federated Farmers of New Zealand (Inc)
PO Box 5242
Dunedin

Mobile: 0274755615
Email: dsycamore@fedfarm.org.nz